CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Mount Vernon prepared a five-year Consolidated Plan covering program years 2018 - 2022 for all Community Development Block Grant (CDBG)-funded activities conducted by the City of Mount Vernon. In the Consolidated Plan, needs were identified, goals established, and strategies defined. Beginning in 2015, the City's CDBG efforts have been reported along with the Consolidated Plan of the Skagit County Consortium and its regional service area for use of other federal funding for housing-related strategies.

In reviewing activities accomplished with its federal funding this past program year, the City of Mount Vernon advanced its goals of increasing the supply of affordable owner-occupied housing and supportive rental housing, maintaining affordable housing stock, supporting efforts to reduce poverty and provide services for people who are low-income, supporting public facilities to revitalize the Downtown neighborhood, and responding to the Covid-19 pandemic with subsistence payments for Covid-19 impacted households and microenterprise assistance for Covid-19 impacted CDBG-eligible microenterprises. The funded projects to achieve these goals were selected based on consultation with local agencies and in response to the area's countywide Continuum of Care Plan and the Skagit County Consortium Consolidated Plan process.

Along these lines, CDBG funds were allocated to public services provided to city residents by Community Action of Skagit County (CASC). Funds were made available through Skagit Habitat for Humanity to provide homeownership assistance to CDBG-eligible homebuyers. CDBG was allocated for property acquisition for an affordable housing project with Friendship House. The City allocated CDBG for microenterprise assistance for CDBG-eligible businesses in downtown Mount Vernon. The City continued making payments on a CDBG Section 108 loan the City received to help revitalization of one of its highest concentration low-income neighborhoods – the downtown area (Census Tract 9525, especially block group 3).

In addition, the City amended the Annual Action Plan to add CARES Act CDBG-CV1 and -CV3 funding to prevent, prepare for, and respond to the Covid-19 pandemic with additional activities: (1) Microenterprise assistance activities: The Economic Development Alliance of Skagit County assisted the City with implementation of CDBG microenterprise assistance activities that directly benefit Mount Vernon businesses that have suffered a loss of income as a result of the COVID-19 disaster and qualify as CDVG-eligible microenterprises (no more than five employees with an owner whose household income is at or below 80 percent of the area median income); (2) Direct emergency payments for rent, utilities,

public services: Community Action of Skagit County will assist the City with the distribution of direct emergency payments for rent and utility costs on behalf of CDBG-eligible households whose loss of income causes an imminent risk of homelessness; and (3) acquisition of emergency shelter modules called Pallet Shelters that are being used as temporary emergency shelter for people experiencing homelessness and impacted by COVID-19.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Administration and planning	Administration and Planning	CDBG:	Other	Other	0	0				
Increase supply affordable owner-occupied housing	Affordable Housing	CDBG:	Homeowner Housing Added	Household Housing Unit	0	0		2	0	0.00%
Increase supply affordable owner-occupied housing	Affordable Housing	CDBG:	Direct Financial Assistance to Homebuyers	Households Assisted	0	0				
Increase supply of affordable rental housing	Affordable Housing	CDBG:	Rental units constructed	Household Housing Unit	100	0	0.00%			
Increase supply of affordable rental housing	Affordable Housing	CDBG:	Other	Other	0	0		1	0	0.00%

Maintain affordable housing stock	Affordable Housing	CDBG:	Rental units rehabilitated	Household Housing Unit	0	0				
Microenterprise Assistance Activities	Non-Housing Community Development	CDBG: \$12500	Businesses assisted	Businesses Assisted	8	0	0.00%	6	0	0.00%
Support public facilities for revitalization	Non-Housing Community Development	CDBG:	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3000	0	0.00%			
Support public facilities for revitalization	Non-Housing Community Development	CDBG:	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		3000	0	0.00%
Supportive efforts to reduce poverty	Non-Homeless Special Needs	CDBG:	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
Supportive efforts to reduce poverty	Non-Homeless Special Needs	CDBG:	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		1200	0	0.00%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The CDBG funds were used to address the priorities and specific objectives identified in the 2018-2022 Consolidated Plan and 2020-2021 Annual Action Plan. Even though the expectations were higher than some of the actual accomplishments, substantial progress towards meeting the priorities were made. Affordable Housing, Public Facilities, Public Services, and Microenterprise Assistance were identified as high priorities.

During the 2020 program year, to increase the supply of affordable rental housing, the City of Mount Vernon CDBG funds were offered to Friendship House for property acquisition for a housing project that will serve people experiencing homelessness. Friendship House worked closely with City staff during the process to ensure acquisition program compliance. The planned project is moving forward as planned, although it suffered a setback and delay when the owner of a suitable property withdrew their willingness to sell.. If all goes well, the project will proceed during the 2021-2022 program year.

Another high priority goal is the follow-through on support for revitalization of Downtown Mount Vernon by investing in the construction of a floodwall to protect and bring more private investment into one of the City's (low- to moderate-income (LMI) neighborhoods. All three phases of the floodwall project have now been completed, and the City will continue to make annual payments on the Section 108 loan from its annual CDBG award.

Increasing the supply of affordable owner-occupied housing will result from the \$100,000 allocated for homeownership assistance activities proposed by Skagit Habitat for Humanity, with CDBG HOA to be combined with other sources of funding and sweat equity to make monthly housing costs affordable for LMI homebuyers in Mount Vernon. Skagit Habitat for Humanity working to secure the matching funds that will be needed in order to make the MV CDBG HOA usable and expects to complete and sell two homes during the 2021-2022 program year.

To prevent, prepare for, and respond to the Covid-19 pandemic using CDBG-CV1 funding, the City allocated funding for three additional activities that would began implementation after July 1, 2021: microenterprise assistance activities, direct emergency payments for household impacted by the Covid-19 pandemic, and acquisition of emergency shelter modules called Pallet Shelters.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG
White	3,424
Black or African American	117
Asian	30
American Indian or American Native	324
Native Hawaiian or Other Pacific Islander	59
Total	3,954
Hispanic	1,640
Not Hispanic	3,440

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

Note that the table above does not include those who reported more than one race, including 63 who are American Indian/Alaskan Native and white, 14 who are Black/African American and white, 9 who are American Indian/Alaskan Native and Black/African American, and 1,032 who are Other Multiracial. The composition of the 5,080 clients served by CDBG-funded activities in 2020 for which racial and ethnic identity is available was 67.4% white, 2.3% Black or African American, 6.7% American Indian or American Native, 1.1% Native Hawaiian or Other Pacific Islander, and 22.2% reporting more than one race. Of the 5,080 total served, 1,640 people, or 32.3%, were Hispanic.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made	Amount Expended	
		Available	During Program Year	
CDBG	public - federal	871,939	598,357	

Table 3 - Resources Made Available

Narrative

The City's 2020 CDBG grant award was \$383,863, and the CARES Act CDBG-CV3 formula added an additional \$488,076 during the program year. The City expended \$598,356.77 during the program year from July 1, 2020 through June 30, 2021.

The City received no program income during the 2020 program year.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Census Tract 9522			
Census Tract 9523			
			CDBG-CV after AAP
City of Mount Vernon	68	83	posted
DOWNTOWN MOUNT			Loan repayment as
VERNON	32	17	planned

Table 4 – Identify the geographic distribution and location of investments

Narrative

The Downtown Mount Vernon target area refers to the Floodwall Section 108 loan repayment.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The City of Mount Vernon investment of CDBG funding leverages other resources and Mount Vernon supports applications for funding from other resources for affordable housing, supportive services, community development, and related activities.

The CDBG funding is a small but significant fraction of the resources that CASC assembles each year for public services, helping to sustain and improve what CASC is able to provide. CASC is able to access HOME TBRA, WA Commerce Consolidated Homeless Grant funds, WA CDBG Public Services funds via Skagit County, and private contributions.

The CDBG allocated for homeownership assistance activities will likely leverage five to ten times that amount from other sources when a home is purchased. Matching sources include WA Housing Trust Fund and HOME homeownership assistance.

CDBG funds will be used for real property acquisition for Friendship House's housing project that will leverages other funding for acquisition from charitable contributions.

In 2020, the City continued to make Section 108 loan payments using its annual CDBG grants. Those CDBG 108 funds leveraged many times the HUD funding amount from other federal, state, and local funding sources to bring the floodwall project to completion.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be		
provided affordable housing units	6	0
Number of Non-Homeless households to be		
provided affordable housing units	0	0
Number of Special-Needs households to be		
provided affordable housing units	0	0
Total	6	0

Table 5 - Number of Households

	One-Year Goal	Actual
Number of households supported through		
Rental Assistance	0	0
Number of households supported through		
The Production of New Units	0	0
Number of households supported through		
Rehab of Existing Units	0	0
Number of households supported through		
Acquisition of Existing Units	3	0
Total	3	0

Table 6 - Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

CDBG for real property acquisition for a rental housing project made progress in 2020, with a specific site identified for purchase that later fell through when the seller declined to sell. The project moved forward into 2021, and if all goes well, the purchase of a home will be ready for occupancy by people experiencing homelessness during the 2021 program year.

The City's 2020 Action Plan called for LMI homebuyers to receive direct financial assistance to purchase a home. The City's partner agency for this activity is Skagit Habitat for Humanity, and the direct financial assistance to lower the mortgage principal amount to an affordable level. Skagit Habitat and its client homebuyers are challenged by a housing market with escalating home prices, making it difficult to close the larger financing gap between what the LMI homebuyers can afford and the cost of building homes in the City of Mount Vernon. The CDBG funds provide a portion of this financing gap. Skagit Habitat addressed these problems by supplementing the City's CDBG funds with additional gap financing from other sources, including the Skagit County and sweat equity. Additional matching funds will be required.

Discuss how these outcomes will impact future annual action plans.

The experience of Skagit Habitat is being challenged by homebuilding costs that are adverse to LMI households with CDBG homeownership assistance that makes it challenging to make homeownership affordable. The City will need to be patient with the proposed remedies (finding additional matching funds) that will be required. The rate of success with prior CDBG homeownership assistance activities led the City to allocate additional funding for homeownership assistance during the 2021-2022 program year.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	4,247	0
Low-income	668	0
Moderate-income	147	0
Total	5,062	0

Table 7 – Number of Households Served

Narrative Information

The activities that used CDBG funding in PY 2020, required information on income by family size. The numbers above do not include 18 people with incomes above 80% AMI who received assistance from CASC.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

There are many organizations coordinating services toward the common goals of the Skagit County 10-Year Plan to End Homelessness. The City of Mount Vernon is supportive of these efforts and contributes directly from CDBG resources to fund public services at Community Action of Skagit County, providing information and referral to people experiencing homelessness or who have low or extremely low income. The City allocated CDBG funding toward the cost of property acquisition for a rental housing project that will provide supportive housing for people who have experienced homelessness. The City will continue to participate in local efforts to implement the 10-Year Plan.

Community Action of Skagit County operates a housing coordinated entry system in Mount Vernon for people who are homeless, at risk of becoming homeless, or who have other struggles. Outreach is conducted to organizations and individuals to make them aware of this service. There are also special-focus outreach efforts such as those being conducted though the local Supportive Services for Veteran Families program, a VA grant-funded program serving homeless veterans and their families.

Additionally, each year, many organizations and hundreds of individuals organize a Project Homeless Connect event that provides a wide array of health and social services to hundreds of homeless persons, including whose who are living in Mount Vernon.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City provides CDBG public services funding to Community Action of Skagit County so that CASC can operate the centralized coordinated entry system so that families and individuals can access emergency shelter or emergency rent assistance.

Following are the City's highlights and accomplishments to-date with regard to homelessness:

2017: partnering with Skagit County the City hired a full-time social worker embedded in the Police Department whose primary duties revolve around helping the homeless with a variety of issues aimed at getting them into housing.

2018: the City adopted Ordinance 3743 to allow temporary homeless encampments on properties owned by religious organizations.

2018: the City created a cross-departmental team named the Problem Elimination & Reduction Team or PERT that has identified actions that can be taken to reduce and/or mitigate impacts.

2019: Hired a full-time employee to monitor and clean homeless encampments, hired park ranger, contributed to land purchase for a permanent supported housing building for people experiencing homelessness chronically.

2020: Supported the costruction of a supportive housing project that will provide permanently housing for people how have experienced homelesness. Responded to the needs created by COVID-19 by using CDBG-CV1 and CV-3 for additional family services, motel vouchers, microenterprise assistance.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Community Action of Skagit County uses funding from the Washington State Department of Commerce, the federal Department of Veterans Affairs, and local document recording surcharge revenue to provide rapid rehousing services to individuals and families. These services include temporary financial assistance for rent assistance and emergency needs, housing counseling and locator services, and housing case management. Community Action also offers similar services in the category of homeless prevention to help families and individuals from becoming homeless in the first place, or to prevent a repeat episode of homelessness. Case management services to homeless families is designed to help new tenants become stable, successful renters and to become more self-sufficient.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Skagit County Public Health, in partnership with several local nonprofit organizations, and in coordination with law enforcement agencies, provide re-entry housing services for people who are returning to the community from jail, prison, psychiatric hospitalization, and inpatient substance abuse treatment.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The Housing Authority of Skagit County serves the City of Mount Vernon. The Housing Authority does not operate any public housing. Nevertheless, the Housing Authority does own and operate an important low-income rental project in Downtown Mount Vernon, the President Apartments, that is in need of major rehabilitation. The City's work and CDBG investment in completing the Skagit River floodwall to protect the Downtown neighborhood will make it more feasible for the Housing Authority to rehabilitate the President Apartments because, upon completion of the floodwall project, the building is no longer located in the floodplain, making public and private investment in this historic building rehabilitation more attractive.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

There is no public housing in the City of Mount Vernon.

Actions taken to provide assistance to troubled PHAs

Not applicable

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

Community Action of Skagit County, Skagit Habitat for Humanity, Friendship House, and others. The City and County work closely together as participants in the regional Consolidated Plan of the Skagit County Consortium.

In 2020, the City remained committed to a partnership with Skagit County and Catholic Housing Services to plan and build a Housing First supportive housing project for 70 or more homes for people who have experienced homelessness chronically. CDBG funding was used for land acquisition, and the project is now under construction.

The City's Comprehensive Plan helped guide development goals, objectives, policies and ordinances allowing for the first permanent supportive housing projects in Mount Vernon. The City's overlay zone to allow the siting of the project is used as a model ordinance across the state.

In 2018, to help address the public policies, the City adopted Ordinance 3743 to allow temporary homeless encampments on properties owned by religious organizations. Ordinance 3754 reduced traffic impact fees, and updated zoning codes, design standards, density, and allowable uses to increase the prospects that more homes will become available and the low vacancy rates will increase.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The City has taken action to authorize, fund, and create the first Housing First! project in Skagit County, using CDBG for land acquisition for a permanent supportive housing project to be developed, owned, and managed by Catholic Housing Services with financial support from the City, County, and other agencies. The City adopted an overlay zone that allows the citing of supportive housing facilities.

In 2018, 2019, and 2020, the City has also set aside CDBG funding to assist Friendship House with the costs of acquisition of facilities that will ease the burden of homelessness.

In 2020 the City has taken action to support income-qualified homebuyers who otherwise could not afford to purchase a home in Mount Vernon without CDBG homeownership assistance from the City and other sources.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

In 2018 the repair and maintenance work completed by Catholic Housing Services included lead-safe practices. In the future, all housing rehabilitation efforts on homes that were built before 1978 will

include lead-based paint hazard evaluations, and all homes built before 1978 and purchased with CDBG homeownership assistance will include a lead hazard inspection and response. All hazards will be addressed, either through abatement or interim controls to minimize the hazards.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

In 2020 the City provided CDBG funds to Community Action of Skagit County to assist households below the poverty level with services. In the 2020-2021 program year, this included supporting CASC's efforts to provide assistance to persons with LMI and coping with housing instability and cost burdens.

The floodwall project, now completed and partially funded by CDBG, is having an immediate and long-term impact on downtown and its surrounding neighborhoods, increasing the job and business opportunities in the vicinity. Taking a longer view, the City favors economic development programs, including those delivered by the Economic Development Association of Skagit County and others, in support of business development and job creation. City CDBG-CV1 was used in 2020 for microenterprise assistance activites, and the floodwall public facility project has a direct and long-term impact on the economics of downtown Mount Vernon.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

Starting in 2014, the City worked in partnership with adjacent and regional jurisdictions to create a regional HUD HOME Consortium. The Skagit County Consortium has enhanced the resource base for developing more affordable housing, and for addressing institutional barriers to creating more affordable housing.

In 2020 the Consortium continued its efforts to build strong relationships among participating jurisdictions and contractors. These efforts included regular meetings and contacts with agencies and representatives from participating jurisdictions.

The City and Skagit County Consortium continue to formalize relationships through the use of agreements and contracts. Additionally, the Consortium provides representation on local community and interagency workgroups involved in Coordinated Entry or other programs with outreach and involvement with households who may benefit from HOME funding.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

In 20 20 City supported the efforts of the Skagit Coalition to End Homelessness which includes many housing and social service agencies, some of which have staff who reach out to private landlords to encourage their participation in efforts to reduce homelessness. These efforts will advance the goals of

the Coalition's 10-Year Plan to End Homelessness and have led to public-private partnerships including the Catholic Housing Services supportive housing project, the proposed Friendship Housing facility project, and the homeownership project with Skagit Habitat for Humanity.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The City completed an Analysis of Impediments to Fair Housing with assistance from the Fair Housing Center of Washington which led to a fair housing action plan during the 2015-2016 program year.

In order to overcome impediments to fair housing choice, the City endorses the Skagit County funding for a landlord liaison to educate landlords and tenants of their rights. The City will be revisiting its Analysis of Impediments and increasing its efforts to improve fair housing choice.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City's CDBG program is audited by HUD and the State under the Single Audit Act on an as-needed basis based on risk assessments. This audit verifies that the City meets all statutory requirements and that information reported is correct and complete.

The City's Project Development Manager is responsible for monitoring CDBG program activities. The City staff monitors subrecipients as needed to ensure all regulatory requirements are met and that the information reported is complete and accurate. The City has adopted monitoring standards and procedures as described in Managing CDBG: A Guidebook for Grantees on Subrecipient Oversight.

CDBG subrecipients and contractors are also monitored from written reports submitted to the City. Monitoring of the CDBG program is consistent with program regulations. Monitoring consists of both desk and on-site reviews.

The City also conducts monitoring of its CDBG activities. CDBG monitoring depends on the activity. Construction or acquisition projects will be monitored as they progress in order to ensure compliance with specific federal requirements, including Davis-Bacon, Section 3, NEPA, and Uniform Relocation and Acquisition requirements.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The City of Mount Vernon encourages residents and other interested parties to participate in the CDBG process by attending public hearings and submitting comments if unable to attend. Comments can be considered at any time, and the City will immediately consider all comments received.

To get the word out, the City advertises in the Skagit Valley Herald newspaper (in both English and Spanish) to notify the public of upcoming meetings, fund availability, and how to submit comments. The City also makes these notices available on the City's website and at the Public Library and at the Housing Authority office.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The increased CDBG funding to the City from the CARES Act CDBG-CV1 and -CV3 funding allocation led to amendments to the City's 2019 Annual Action Plan to add three new activities, emergency subsisitence funding, microenterprise assistance to be delivered during the 2020-2021 program year, and acquisition of emergency shelter modules for people experiencing homelessness.

Timely spending of the funds for direct homebuyer assistance from program years 2014 and 2015 was a challenge that the City hopes can be corrected by the Skagit Habitat for Humanity in the future. The City will keep a close eye on the progress of Skagit Habitat's actions to improve this situation by finding matching funds. At this time, though, the City is not anticipating any changes in program objectives

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-45 - CDBG 91.520(c)

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